

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

Contact RACTrac Support with Questions:
RACTracsupport@providercs.com or 1-888-722-8712

RACTrac Question (As they appear on the Survey)	User Definition	Vendor Notes (VNote) and Comments
Overpayments – Automated		
<p>Have you experienced RAC Activity? Yes or No</p> <p>If yes, please tell us the date and month in which activity started.</p>	<p>Being notified by the Medicare Recovery Audit Contractor (e.g. DCS, HDI, CGI or Connolly Associates) would include correspondence of either a medical record request or a demand letter.</p>	<p>Comment: The user is prompted to answer this question every quarter until the response is YES.</p> <p>The date of the start of RAC activity is captured in the AHA admin reports.</p>
<p><input type="checkbox"/> Check here if your hospital is not tracking automated claim denials</p> <p><i>If checked skip to Overpayments – complex RAC Reviews.</i></p>	<p>By checking this box you have indicated that your organization is not currently tracking automated claim denials. By checking this box you will skip this section and immediately move to the next section of the survey.</p>	<p>Comment: This is captured in the Status report available to state, regional and metropolitan association and health system RACTrac users.</p>
<p>1. Total cumulative number of automated claim denials</p>	<p>Automated review occurs when a RAC makes a claim determination without a human review of the medical record. RACs use proprietary software that is designed to detect certain types of errors including but not limited to duplicate payments, billing or coding errors. The RAC notifies the provider via a demand letter when an overpayment has been identified through automated review.</p> <p>Report the <u>total cumulative</u> number of claims denied through the automated review process through the end of the quarter for which you are reporting. Each claim identified as having an overpayment will count once.</p>	<p>VNote: Often times the provider will get one demand letter that will reference several claims identified as overpayments. <u>Each claim</u> - not the number of demand letters - counts as an automated claim denial.</p>
<p>2. Total (estimated) cumulative dollars associated with automated claim denials</p>	<p>Report the <u>total cumulative</u> estimated dollar value of the claims denied through the automated review process through the end of the quarter for which you are reporting. The estimated dollar value is indicated on the review results letter and on the demand letter from the RAC.</p>	<p>VNote: The word “estimated” remains in this question because sometimes the letters do not necessary match the dollars recouped. The dollar amount of an overpayment should be clearly stated in the RAC demand letter.</p>

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<p>3. Total cumulative dollars recouped to date for automated claim denials</p>	<p>Report the <u>total cumulative</u> dollars that have been recouped pursuant to a RAC automated claim denial, without regard to appeal activity. Include only <u>actual dollars returned</u> to Medicare program by your organization from the date your facility was first affected thru the end of the quarter for which you are reporting. Do not include estimated recoupments for automated denials that have not yet been processed or for those denials in which you have filed an appeal within 30 days and therefore stopped recoupment from occurring.</p>	<p>Comments: The claims processing contractors (FI/MAC) have been known to be delayed in processing the overpayments. Regulations now state that the provider can stop recoupment from occurring if filing an appeal within 30 days. Therefore we would only be asking for the actual total dollars recouped to date at the time hospitals are reporting data.</p>
<p><input type="checkbox"/> Check here if your hospital has had no new activity this quarter.</p> <p>(If checked, skip to Overpayments- Complex RAC Reviews)</p>	<p>RACTrac is a quarterly survey and from time to time, there will be no new activity for hospitals between quarters. If data was reported in quarter one, but there is no new activity in quarter 2, the hospital should reenter the data from quarter 1 into questions 1, 2 and 3 as those numbers remain the same and check this box to denote that there were no subsequent denials to be indicated in this quarter.</p>	<p>VNote: The survey tool does not carry forward data from the previous quarter. The only way it will be captured from quarter to quarter is if the hospital responds to the survey every quarter and reenters their data or notes in this checkbox, that there was no new activity in the requested quarter.</p>
<p>4. Indicate the service areas in which automated RAC denials have occurred this quarter.</p> <p>Please select you hospital type in 4a and then indicate the services in which automated RAC denials have occurred for your hospital this quarter in 4b. Check all that apply.</p>	<p>Medicare claim denials from the RACs can fall in any number of service areas of the hospital. The choices presented allow the hospital to first associate itself a type of hospital listed in 4a and then indicate all the service areas within that hospital that experienced Medicare claim denials through the automated review process <u>this quarter</u>.</p> <p>Example: An Inpatient Rehabilitation Hospital had outpatient automated denials as well as inpatient automated denials this quarter. In 4a the selection would be Inpatient Rehabilitation Hospital and 4b the selection would be both inpatient and outpatient.</p> <p>NOTES – Definitions Below 4a: Hospital Type: ■ Medical/Surgical Acute Care Hospital (includes Critical Access Hospitals)</p>	<p>The user must first associate them self with the type of facility and then check the appropriate services that were affected by the automated RAC Activity.</p> <p><i>Hospital type definitions noted below in gray.</i></p> <p>VNote: At this time we do not have any corresponding reasons for denial should it occur in the skilled nursing unit of a medical/surgical acute care hospital.</p>

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	<ul style="list-style-type: none"> ▪ Inpatient Rehabilitation Hospital ▪ Psychiatric Hospital ▪ Long Term Care Hospital <p>4b. Service Areas (Dependent on selection in 4a)</p> <p>Medical/Surgical Acute Care Hospital (including CAH's)</p> <ul style="list-style-type: none"> ▪ Inpatient ▪ Outpatient ▪ Psychiatric Services ▪ Inpatient Rehabilitation ▪ Skilled Nursing - (No corresponding denial reasons) ▪ Other (i.e. Physician services, DME) <p>Inpatient Rehabilitation Hospital</p> <ul style="list-style-type: none"> ▪ Inpatient ▪ Other <p>Psychiatric Hospital</p> <ul style="list-style-type: none"> ▪ Inpatient ▪ Other <p>Long Term Care Hospital</p> <ul style="list-style-type: none"> ▪ Inpatient ▪ Other 	
Data definitions for Hospital Types For All of AHA RACTrac Hospital Type Questions		
Medical/Surgical Acute Care Hospital	Medical/Surgical Acute Care Hospitals include critical access hospitals, cancer hospitals, specialty med/surg hospitals (surgical, women's, cardiac, orthopedic, etc.), children's hospitals and federal or state run hospitals that provide medical/surgical acute care services. These hospitals may have several distinct part units including skilled nursing, inpatient rehabilitation and swing beds, but the majority of services are provided in the inpatient or outpatient settings of these hospitals.	VNote: RACTrac is currently <u>not</u> seeking data from free standing skilled nursing facilities or ambulatory surgery centers that may be owned or operated by the hospital or health system.
Inpatient Rehabilitation Hospital	Freestanding inpatient rehabilitation hospitals are those that are paid under the Medicare inpatient rehabilitation perspective payment system and primarily provide inpatient and outpatient rehabilitation services to patients.	
Psychiatric Hospital	Freestanding psychiatric hospitals are those that are paid under the Medicare psyche perspective payment system and provide primarily inpatient psychiatric services to patients.	
Long Term Care Hospital	Freestanding long term care hospitals are those paid under the Medicare long term care perspective payment system. CMS defines a long term care	

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	hospital as one which has an average inpatient length of stay greater than 25 days.	
<p>5. Rank order the services by the <u>number</u> of automated claim denials <u>this quarter</u>.</p> <p>(Number 1 for the largest number 3 for the third largest number of claims denied in this quarter)</p>	<p>Select number 1 for the service with the largest number of claims denied <u>this quarter</u>, number 2 for the second largest number and number 3 for the third largest number. Each claim identified as having an overpayment counts as one automated denial (not the number of demand letters received for automated denials as it is likely there will be more than one claim cited for improper payment in the demand letter).</p> <p>Example: If your hospital is a medical/surgical acute care hospital and you only experienced outpatient automated claim denials <u>this quarter</u> then you would choose number 1 as Medical/Surgical Acute Care Hospital – Outpatient and leave the rest blank. If you had 35 outpatient claim denials and 42 inpatient claim denials, you would rank inpatient as number 1 and outpatient as number 2 and not make any selection in number 3.</p> <p>VNote: The choices for selection include and should be selected based on the hospital type:</p> <ul style="list-style-type: none"> ▪ <i>Medical/Surgical Acute Care Hospital - Inpatient</i> ▪ <i>Medical/Surgical Acute Care Hospital - Outpatient</i> ▪ <i>Medical/Surgical Acute Care Hospital - Psychiatric Services</i> ▪ <i>Medical/Surgical Acute Care Hospital - Inpatient Rehabilitation</i> ▪ <i>Medical/Surgical Acute Care Hospital - Skilled Nursing</i> ▪ <i>Medical/Surgical Acute Care Hospital - Other (i.e., Physician Services, DME)</i> ▪ <i>Inpatient Rehabilitation Hospital - Inpatient</i> ▪ <i>Inpatient Rehabilitation Hospital – Outpatient</i> ▪ <i>Inpatient Rehabilitation Hospital - Other</i> ▪ <i>Psychiatric Services Hospital - Inpatient</i> ▪ <i>Psychiatric Services Hospital - Other</i> ▪ <i>Long Term Care Hospital - Inpatient</i> ▪ <i>Long Term Care - Other</i> 	

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<p>6. Rank order the services by the <u>estimated dollar value of automated claim denials this quarter.</u></p>	<p>Rank the top three services by estimated total dollar value of the automated claim denials. Number 1 is for claims associated with the greatest dollar value; number 2 is second largest dollar value and number 3 for the third largest dollar value. The dollar value of the claim is indicated on the RAC demand letter.</p> <p>Example: Each automated denial will have a corresponding dollar value associated with it. If the hospital has 23 inpatient denials that total \$3,000 and 10 outpatient denials that total \$5,000 then you would rank outpatient as number 1 and inpatient as number 2.</p> <p>The choices for selection include and should be selected based on the hospital type:</p> <ul style="list-style-type: none"> ▪ <i>Medical/Surgical Acute Care Hospital - Inpatient</i> ▪ <i>Medical/Surgical Acute Care Hospital - Outpatient</i> ▪ <i>Medical/Surgical Acute Care Hospital - Psychiatric Services</i> ▪ <i>Medical/Surgical Acute Care Hospital - Inpatient Rehabilitation</i> ▪ <i>Medical/Surgical Acute Care Hospital - Skilled Nursing</i> ▪ <i>Medical/Surgical Acute Care Hospital - Other (i.e., Physician Services, DME)</i> ▪ <i>Inpatient Rehabilitation Hospital - Inpatient</i> ▪ <i>Inpatient Rehabilitation Hospital – Outpatient</i> ▪ <i>Inpatient Rehabilitation Hospital - Other</i> ▪ <i>Psychiatric Services Hospital - Inpatient</i> ▪ <i>Psychiatric Services Hospital - Other</i> ▪ <i>Long Term Care Hospital - Inpatient</i> ▪ <i>Long Term Care - Other</i> 	

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<p>7. Select the reasons cited by the RAC for automated claim denials for <u>this quarter</u>.</p> <p>Please make the correct selection based on the type of services provided by your hospital. Check all that apply.</p>	<p>On the automated denial demand letter from the RAC to the provider, the RAC indicates the reason for the overpayment. AHA has broadly categorized several reasons by hospital/service type that were identified during the demonstration program. Please read carefully through each of the denial reasons to determine ANY and ALL categories which reflect the reason for automated denial notifications received for <u>this quarter</u>.</p> <p>Example: Medical/Surgical Acute Care hospital experiences outpatient billing and coding errors as well as duplicate payments in their inpatient and inpatient rehabilitation unit in quarter 2. The correct selections would be</p> <ol style="list-style-type: none"> 1. Medical/Surgical Acute Care Hospital/Services - Duplicate Payment 2. Medical/Surgical Acute Care Hospital/Services - Outpatient Coding Error 3. Medical/Surgical Acute Care Hospital/Services - Outpatient Billing Error 4. Inpatient Rehabilitation Hospital/Unit - Duplicate Payment <p>The choices for selection include and should be selected based on the hospital type or unit (definitions noted below):</p> <ul style="list-style-type: none"> ▪ Medical/Surgical Acute Care Hospital/Services - Duplicate Payment ▪ Medical/Surgical Acute Care Hospital/Services - Incorrect Discharge Status ▪ Medical/Surgical Acute Care Hospital/Services - Inpatient Coding Error (MSDRG) ▪ Medical/Surgical Acute Care Hospital/Services - Outpatient Coding Error ▪ Medical/Surgical Acute Care Hospital/Services - Outpatient Billing Error ▪ Medical/Surgical Acute Care Hospital/Services - All Other (Enter the reason in the text box) ▪ Inpatient Rehabilitation Hospital/Unit - Duplicate Payment ▪ Inpatient Rehabilitation Hospital/Unit - Inpatient Rehabilitation Coding Error (CMG) ▪ Inpatient Rehabilitation Hospital/Unit - All Other (Enter the reason in the text box) 	

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	<ul style="list-style-type: none">▪ Psychiatric Services Hospital/Unit - Duplicate Payment▪ Psychiatric Services Hospital/Unit - Inpatient Psych Coding Error (MSDRG)▪ Psychiatric Services Hospital/Unit - All Other (Enter the reason in the text box) ▪ Long Term Care Hospital/Unit - Duplicate Payment▪ Long Term Care Hospital/Unit - Inpatient Coding Error (MSDRG)▪ Long Term Care Hospital/Unit - All Other (Enter the reason in the text box)	
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<p align="center">Definitions of Automated Denial Reasons for Question 7, 8 and 9 – Automated</p> <p><i>NOTE: Reasons for denial are hospital type and services based. For example, a user can be associated with a Medical/Surgical Acute Care Hospital and still have denial reasons in the Inpatient Rehabilitation Hospital/Services area due to a distinct part unit. Please contact RACTracsupport@providerpcs.com if you have questions.</i></p>		
Medical/Surgical Acute Care Hospital/Services - Duplicate Payment	Use this reason code to note more than one claim was paid for the same service by the Medicare claims processor (e.g. two appendectomies billed for the same patient on the same day.)	
Medical/Surgical Acute Care Hospital/Services – Incorrect Discharge Status	Use this reason code to note an incorrect discharge status on the original claim and therefore cited for inaccurate payment. For example, the claim indicates discharge to home or other facility but a subsequent claim for the same patient on the same day shows that the beneficiary was discharged to another hospital.	
Medical/Surgical Acute Care Hospital/Services –Inpatient Coding (MSDRG)	Medicare has now moved to MS-DRGs so what the RACs may or may not find with regard to automated reviews of inpatient claims is currently undefined. Use this reason code to note incorrect ICD-9 codes on the claim.	
Medical/Surgical Acute Care Hospital/Services – Outpatient Coding	Use this reason code to denote an error in HCPCS code assignment or other outpatient coding related error.	
Medical/Surgical Acute Care Hospital/Services – Outpatient Billing	Use this reason code to note incorrectly billed units or charge issues as well as misuse or incomplete billing modifiers. Examples include but are not limited to incorrect billing of the drug Neulasta, or outpatient speech therapy units billed incorrectly.	
Medical/Surgical Acute Care Hospital/Services – All Other	Use this reason code for any denial reason that is not currently captured for your organization type. Please “contact us” and tell us about this reason for denial.	
Inpatient Rehabilitation Hospital/Unit- Duplicate Payment	Use this reason code to note more than one claim was paid for the same service by the Medicare claims processor.	
Inpatient Rehabilitation Hospital/Unit –Inpatient Rehabilitation Coding Error (CMG)	Use this reason code to denote inappropriate codes leading to incorrect billing of the case mix group (CMG) on the inpatient rehabilitation claim.	

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Inpatient Rehabilitation Hospital/Unit – All Other	Use this reason code for any denial reason that is not currently captured for your organization/service types. In addition to selecting this reason code, please use the “contact us” link on this page and tell us about the more specific reason for denial.	
Psychiatric Hospital/Unit-Duplicate Payment	Use this reason code to note more than one claim was paid for the same service by the Medicare claims processor.	
Psychiatric Hospital/Unit – Inpatient Psych Coding (MSDRG)	Medicare has now moved to MS-DRGs so what the RACs may or may not find with regard to automated reviews of inpatient claims is currently undefined. Use this reason code to note incorrect ICD-9 codes on the claim.	
Psychiatric Hospital/Unit – All Other	Use this reason code for any denial reason that is not currently captured for your organization/service type. In addition to selecting this reason code, please use the “contact us” link on this page and tell us about the more specific reason for denial.	
Long Term Care Hospital/Unit – Duplicate Payment	Use this reason code to note more than one claim was paid for the same service by the Medicare claims processor (e.g. two colonoscopies billed for the same patient on the same day.)	
Long Term Care Hospital/Unit - Inpatient Coding Error (MSDRG)	Medicare has now moved to MS-DRGs so what the RACs may or may not find with regard to automated reviews of inpatient claims is currently undefined. Use this reason code to note incorrect ICD-9 codes on the claim.	
Long Term Care Hospital/Unit – All Other	Use this reason code for any denial reason that is not currently captured for your organization/service type. In addition to selecting this reason code, please use the “contact us” link on this page and tell us about the more specific reason for denial.	

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<p>8. Rank order the denial reasons experienced by <u>number of automated claims denied for this quarter.</u></p> <p>(Number 1 for the largest and number 3 for the third largest number of claim denials in this quarter)</p>	<p>Select number 1 for the denial reason with the largest number of claims denied this quarter, number 2 for the second largest number and number 3 for the third largest number.</p> <p>For example, if your hospital is a medical/surgical acute care hospital and this quarter you had 20 claims denied for outpatient billing errors, 10 for duplicate payments and 5 were miscellaneous (and would fall under Other Medical/Surgical Acute Care Hospital/Unit reasons) then these would be your rankings. Number 1: Medical/Surgical Acute Care - Outpatient Billing Errors Number 2: Medical/Surgical Acute Care – Duplicate Payment Number 3: Medical/Surgical Acute Care – All Other</p> <p>A second example would be the following: If you are a medical/surgical acute care hospital with multiple units including a rehab and psych unit with the following claim denials. Inpatient Coding Errors – 25 claims Rehab Unit – Medically Unnecessary – 10 claims Psych Unit – Duplicate payments – 2 claims</p> <p>You would rank them in the following way: Number 1 Medical/Surgical Services – Inpatient Coding Errors Number 2 Inpatient Rehabilitation Unit – Medically Unnecessary Number 3 Psychiatric Unit – Duplicate payments</p>	<p>Use same automated denial definition reasons from above.</p>
<p>9. Rank order the denial reasons experienced by the <u>estimated total dollar value of the automated claim denials for this quarter.</u></p> <p>(Number 1 for the largest and number 3 for the third largest dollar value of claims denied this quarter)</p>	<p>The top three denial reasons are based on the estimated total dollar value of the claims denied this quarter through the automated claim review process and is often indicated on the demand letter from the RAC.</p> <p>Number 1 is the denial reason with the greatest dollar amount of denied claims and Number 3 would be the reason with the third largest dollar amount of claims associated with it. User chooses from reasons as noted above.</p>	<p>Use same denial definition reasons from above.</p>

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Overpayments – Complex		
<input type="checkbox"/> Check here if your hospital is not tracking complex claim denials. (If checked, skip to underpayments)	By checking this box, you are indicating that your hospital is not tracking complex claim denial experience at the present time.	Noted in Status Report
1. Total number of medical record requests received	The total cumulative number of medical records requested for complex review to date. The RAC will send a letter (via US Mail) requesting the medical record for review. Please tally the number of medical records from these requests to date and indicate the total here.	VNote: Please do not include medical record requests that have been rescinded. We collect data on rescinded record requests in the Administrative Burden section of the survey.
1a. Total dollar value of the claims associated with the medical records requested	Each medical record requested has an original Medicare reimbursement payment amount associated with the claim for that patient. Total the original Medicare reimbursement payment amounts for each of the claims associated with the medical record requested.	VNote: We are not asking for billed charges, rather the Medicare reimbursement received for the claim.
2. Total number of medical records where NO improper payment was identified (i.e., denied)	The RACs have 60 calendar days to make a determination of whether or not an inappropriate payment has been identified once the medical record has been received. <i>Some hospitals have noted that RACs have gone beyond this determination timeframe.</i> Once the RAC has made its determination, a hospital will be notified via a review results letter. Please indicate the total number of medical records for which you have been notified to date that NO improper payment has been identified.	VNote: An underpayment could be found upon review of a medical record. Underpayment, or determinations with a return of dollars to the hospital, should solely be counted in the Underpayment section. VNote: We collect data on RACs that have gone beyond the 60 day determination period in the Administrative Burden section of the survey.

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2a. Total dollar value of medical records where NO improper payment was identified	Total the original Medicare reimbursement payment amounts for each of the claims associated with the medical records where NO improper payments were identified	VNote: We are not asking for billed charges, rather the Medicare reimbursement amount received for the claim.
3. Total number of medical records where an overpayment was identified (i.e. denied)	The RACs have 60 days to make a determination of whether or not an improper payment has been identified once the medical record has been received. <i>Some hospitals have noted that RACs have gone beyond this determination timeframe.</i> Upon that determination, a hospital will be notified via a review results letter if an improper payment was found and therefore the associated claim has been “denied”. Please indicate the total number of medical records for which you have been notified to date that an improper payment has been identified and therefore a claim, either in part or in total has been “denied”. The official notification of an overpayment should be based on the receipt of the demand letter, not the review results letter. Please count the number based on the number of the demand letters received, not the number of review results letters received.	VNote: We are not asking for billed charges, rather the Medicare reimbursement amount received for the claim. VNOTE: Due to the nature and timing of the discussion period it is possible that a provider would receive a review results letter without the demand letter at the point of RACTrac reporting. Please only enter denials for which a demand letter has been received. We collect data on untimely demand letters in the Administrative Burden section of the survey.

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3a. Total dollar value of medical records in which an overpayment was identified (i.e. denied)	Total the <u>original payments</u> for each of the claims associated with the medical records that were denied.	
4. Total number of medical records pending determination by the RACs	<p>The number of medical records that are “pending determination” are those for which the provider has not been notified via a review results letter (approval, no overpayment) or demand letter (overpayment) of the outcome of the review.</p> <p>Total number of medical records pending determination = Total number of medical records requested minus total number of medical records approved minus total number of medical records denied .</p>	
4a. Total dollar value of medical records pending determination	<p>Total the original payments for each of the claims associated with the medical records that are pending determination.</p> <p>Total dollar value of medical records pending determination = Total dollar value of medical records requested minus total dollar value of medical records approved minus total number of medical records denied.</p>	
5. Estimate the total dollars associated with the overpayments identified during medical record review (complex claim denials)	The value of the overpayment is communicated via the demand letter from the RAC following the review results letter indicating an improper payment. Indicate the total dollar value for all over payments identified in the demand letter.	
6. Report the total dollars recouped for complex claim denials.	Recoupment should occur on day 41 unless action is taken by the hospital to either stop recoupment or to pay the money back directly. Please indicate the total dollars recouped or paid back to Medicare to date, without regard to appeal activity. <u>Do not count any pending recoupments until they have occurred.</u>	

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<p>7. Indicate the service areas in which complex RAC denials have occurred <u>this quarter</u>.</p> <p>Please indicate the services in which automated RAC denials have occurred for your hospital this quarter in 7b. Check all that apply</p>	<p>Medicare claim denials from the RACs can fall in any number of service areas of the hospital. For question 7A, your hospital type has been pre-selected based on your answer to the Overpayments (automated section). For question 7B, please indicate the services in which complex RAC denials have occurred for your hospital this quarter.</p>	<p>VNote: If you do not have new complex activity this quarter, please skip these questions and go to the Medical Necessity Review section.</p>
<p>8. Rank order the services affected by the greatest number of complex claim denials <u>this quarter</u>.</p> <p>Number 1 is for the largest and number 3 is for the third largest number of claim denials <u>this quarter</u>.</p>	<p>Select number 1 for the service with the largest <u>number</u> of claims denied <u>this quarter</u>, number 2 for the second largest number and number 3 for the third largest number.</p> <p>Example: If your hospital is a medical/surgical acute care hospital and you only experienced outpatient complex claim denials <u>this quarter</u> then you would choose number 1 as Medical/Surgical Acute Care Hospital – Outpatient and leave the rest blank. If you had 35 outpatient claim denials and 42 inpatient claim denials, you would rank inpatient as number 1 and outpatient as number 2 and not make any selection in number 3.</p>	

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<p>9. Rank order the services by the <u>estimated dollar value of the complex claim denials</u> this quarter.</p> <p>Number 1 being the greatest dollar value and number 3 being the third largest dollar value <u>this quarter.</u></p>	<p>Rank the top three services by estimated total dollar value of the complex claim denials. Number 1 is for claims associated with the greatest dollar value; number 2 is second largest dollar value and number 3 for the third largest dollar value. The dollar value of the claim is indicated on the RAC demand letter.</p> <p>Example: Each complex denial will have a corresponding dollar value associated with it. If the hospital has 23 inpatient denials that total \$3,000 and 10 outpatient denials that total \$5,000 then you would rank outpatient as number 1 and inpatient as number 2.</p> <p>The choices for selection include and should be selected based on the hospital type:</p> <ul style="list-style-type: none"> ▪ <i>Medical/Surgical Acute Care Hospital - Inpatient</i> ▪ <i>Medical/Surgical Acute Care Hospital - Outpatient</i> ▪ <i>Medical/Surgical Acute Care Hospital - Psychiatric Services</i> ▪ <i>Medical/Surgical Acute Care Hospital - Inpatient Rehabilitation</i> ▪ <i>Medical/Surgical Acute Care Hospital - Skilled Nursing</i> ▪ <i>Medical/Surgical Acute Care Hospital - Other (i.e., Physician Services, DME)</i> ▪ <i>Inpatient Rehabilitation Hospital - Inpatient</i> ▪ <i>Inpatient Rehabilitation Hospital - Other</i> ▪ <i>Psychiatric Services Hospital - Inpatient</i> ▪ <i>Psychiatric Services Hospital - Other</i> ▪ <i>Long Term Care Hospital - Inpatient</i> ▪ <i>Long Term Care Hospital - Other</i> 	

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<p>10. Select the reasons cited by the RACs for complex claim denials <u>this quarter</u>.</p> <p>Please make the correct selection based on the type of services provided by your organization and check all that apply.</p>	<p>Below are the reasons for complex claim denial and the user can check all that apply.</p> <p>Medical/Surgical Acute Care Hospital/Services - No Documentation Provided or Insufficient Documentation in the Medical Record Medical/Surgical Acute Care Hospital/Services - Incorrect MS-DRG or Other Coding Error Medical/Surgical Acute Care Hospital/Services - Incorrect APC or Other Outpatient Coding Error Medical/Surgical Acute Care Hospital/Services - Short Stay Medically Unnecessary Medical/Surgical Acute Care Hospital/Services - Medically Unnecessary Inpatient Stay Longer than 3 days Medical/Surgical Acute Care Hospital/Services - Other Medically Unnecessary Medical/Surgical Acute Care Hospital/Services – Incorrect Discharge Status Medical/Surgical Acute Care Hospital/Services - All Other (Enter the reason in text box)</p> <p>Inpatient Rehabilitation Hospital/Unit - No Documentation Provided or Insufficient Documentation Inpatient Rehabilitation Hospital/Unit - Incorrect CMG or Other Coding Error Inpatient Rehabilitation Hospital/Unit - All Joint Patients; Medically Unnecessary Inpatient Rehabilitation Hospital/Unit - Other Medically Unnecessary Inpatient Rehabilitation Hospital/Unit - All Other (Enter the reason in text box)</p> <p>Psychiatric Services Hospital/Unit - No Documentation Provided or Insufficient Documentation Psychiatric Services Hospital/Unit - Incorrect MS-DRG or Other Coding Error Psychiatric Services Hospital/Unit - Medically Unnecessary</p>	

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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	Psychiatric Services Hospital/Unit - All Other (Enter the reason in text box)	
	Long Term Care Hospital/Unit - No Documentation Provided or Insufficient Documentation	
	Long Term Care Hospital/Unit - Incorrect MS-DRG or Other Coding Error	
	Long Term Care Hospital/Unit - Medically Unnecessary	
	Long Term Care Hospital/Unit - All Other (Enter the reason in text box)	

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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RACTrac Question (As they appear on the Survey)	User Definition	Vendor Notes (VNote) and Comments
<p align="center">Definitions of Complex Denial Reasons for Question 10, 11 and 12 – Complex</p> <p><i>NOTE: Reasons for denial are hospital type and services based. For example, a user can be associated with a Medical/Surgical Acute Care Hospital and still have denial reasons in the Inpatient Rehabilitation Hospital/Services area due to a distinct part unit. Please contact RACTracsupport@providercs.com if you have questions.</i></p>		
Medical/Surgical Acute Care Hospital/Services – No Documentation Provided or Insufficient Documentation in the Medical Record	Use this reason code to denote when a RAC request a medical record from the provider and the provider either failed to respond within the appropriate time limit (45 calendar days) or failed to send the complete medical record. This is often referred to as a “technical denial.”	
Medical/Surgical Acute Care Hospital/Services– Incorrect MS-DRG or Other Coding Error	Use this reason code to denote that upon review of the medical record the RAC determined that an incorrect MS-DRG assignment was made based on the documentation provided.	
Medical/Surgical Acute Care Hospital/Services – Incorrect APC or Other Outpatient Coding	Use this reason code to denote when a RAC determines that there has been improper billing related to APC assignment, fee-schedule based HCPCS assignment, or other outpatient coding.	
Medical/Surgical Acute Care Hospital/Services – Short Stay Medically Unnecessary	Use this reason code to denote a denial that generally pertains to acute inpatient stays of 1 to 3 days, often referred to as a short stay denial. Examples of these types of denials during the demonstration included but were not limited to patients with pacemaker/surgical procedures, chest pain, back pain, congestive heart failure, and gastroenteritis.	
Medical/Surgical Acute Care Hospital/Services – Medically Unnecessary Inpatient stay Longer than 3 Days	Use this reason code to denote a denial that may include the following justifications for care being determined medically unnecessary: <ul style="list-style-type: none"> • Inpatient service provided should have been done in the outpatient setting • Inpatient should have been observation • No medical necessity for inpatient admission • Level of care not met for inpatient admission • If the reason is cited that it’s Medically Unnecessary and it is not a short stay case as defined above, then it belongs in this category. 	

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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	Please note that more than one procedure occurring on the same day AHA classifies as an duplicate payment – not medically unnecessary as defined in coverage guidelines etc. (e.g. 3 appendectomies in one day, while not medically necessary is really a duplicate payment and should be cited as such.)	
Medical/Surgical Acute Care Hospital/Services – Other Medically Unnecessary	Use this reason code to denote other denials that are not mentioned above or are for more clinical reasons rather than utilization of services reason.	
Medical/Surgical Acute Care Hospital/Services – Incorrect Discharge Status	Use this reason code to note an incorrect discharge status on the original claim and therefore cited for inaccurate payment. For example, the claim indicates discharge to home or other facility but a subsequent claim for the same patient on the same day shows that the beneficiary was discharged to another hospital.	
Medical/Surgical Acute Care Hospital/Services – All Other	Use this reason code to denote if the above mentioned denial reasons are in no way related to the current denials you are experiencing. Please also contact AHA via our “contact us” email and let us know about the types of denials you are experiencing so that we can consider tracking them in RACTrac.	
Inpatient Rehabilitation Hospital/Unit – No Documentation or Insufficient Documentation	Use this reason code to denote when a RAC request a medical record from the provider and the provider either failed to respond within the appropriate time limit (45 calendar days) or failed to send the complete medical record. This is often referred to as a “technical denial”.	
Inpatient Rehabilitation Hospital/Unit – Incorrect CMG or Other Coding	Use this reason code to denote that upon review of the medical record the RAC determined that an incorrect case mix group (CMG) assignment or other coding error was made based on the documentation provided.	
Inpatient Rehabilitation Hospital/Unit – All Joint Patients: Medically Unnecessary	Use this reason code to denote when an inpatient rehabilitation service provided to <u>a joint patient</u> that was deemed medically unnecessary for any of the following reasons including but not limited to: <ul style="list-style-type: none"> • Documentation does not support the need for 24-hour rehab nursing • Documentation does not support the need for 24-hour medical supervision • Documentation does not show a coordinated care plan • Documentation does not show a significant practical improvement • Patient could have been served in a less intense setting • Documentation does not support that therapy services were of relatively intense level of service • Documentation does not reflect realistic goals/progress toward established 	

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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RACTracsupport@providercs.com or 1-888-722-8712

	goals	
Inpatient Rehabilitation Hospital/Unit – Other Medically Unnecessary	<p>Use this reason code to denote when inpatient rehabilitation was denied as medically unnecessary. There are seven criteria outlined in the Medicare Coverage Guidelines to assist providers in determining whether or not care in an IRF setting is clinically appropriate. Reasons for denial under this category include the following.</p> <ul style="list-style-type: none"> • Documentation does not support the need for 24-hour rehab nursing • Documentation does not support the need for 24-hour medical supervision • Documentation does not show a coordinated care plan • Documentation does not show a significant practical improvement • Patient could have been served in a less intense setting • Documentation does not support that therapy services were of relatively intense level of service • Documentation does not reflect realistic goals/progress toward established goals 	
Inpatient Rehabilitation Hospital/Unit – All Other	<p>Use this reason code to denote if the above mentioned denial reasons are in no way related to the current denials you are experiencing.</p> <p>Please also contact AHA via our “contact us” email and let us know about the types of denials you are experiencing so that we can consider tracking them in RACTrac.</p>	
Psychiatric Hospital/Unit - No Documentation or Insufficient Documentation	<p>Use this reason code to denote when a RAC request a medical record from the provider and the provider either failed to respond within the appropriate time limit (45 calendar days) or failed to send the complete medical record. This is often referred to as a “technical denial”.</p>	
Psychiatric Hospital/Unit- Incorrect MS-DRG or Other Coding	<p>Use this reason code to denote that upon review of the medical record the RAC determined that an incorrect MS-DRG assignment was made based on the documentation provided.</p>	
Psychiatric Hospital/Unit - Medically Unnecessary	<p>Medicare does not have criteria for admission into psychiatric hospitals and therefore this reason for denial is currently not specified. Use this reason code to denote a denial reason that may be characterized “as the care could have been provided in a less intensive setting”.</p>	
Psychiatric Hospital/Unit – All Other	<p>Use this reason code to denote if the above mentioned denial reasons are in no way related to the current denials you are experiencing.</p> <p>Please also contact AHA via our “contact us” email and let us know about the types of denials you are experiencing so that we can consider tracking them in</p>	

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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	RACTrac.	
Long Term Care Hospital/Unit – No Documentation or Insufficient Documentation	Use this reason code to denote when a RAC request a medical record from the provider and the provider either failed to respond within the appropriate time limit (45 calendar days) or failed to send the complete medical record. This is often referred to as a “technical denial”.	
Long Term Care Hospital/Unit- Incorrect MS-DRG or Other Coding	Use this reason code to denote that upon review of the medical record the RAC determined that an incorrect MS-DRG assignment was made based on the documentation provided.	
Long Term Care Hospital/Unit - Medically Unnecessary	Medicare does not have criteria for admission into long term acute care hospitals and therefore this reason for denial is currently not specified. Use this reason code to denote a denial reason that may be characterized as the care could have been provided in a less intensive setting.	
Long Term Care Hospital – All Other	Use this reason code to denote if the above mentioned denial reasons are in no way related to the current denials you are experiencing. Please also contact AHA via our “contact us” email and let us know about the types of denials you are experiencing so that we can consider tracking them in RACTrac.	

AHA RACTrac Survey Questions and Data Definitions

APRIL 2011

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RACTrac Question (As they appear on the Survey)	User Definition	Vendor Notes (VNote) and Comments
<p>11. Rank order the denial reasons experienced by number of complex claim denials for <u>this quarter</u>.</p> <p>Number 1 for the largest and number 3 for the third largest number of claim denials <u>this quarter</u>.</p>	<p>Select number 1 for the denial reason with the largest number of claims denied this quarter, number 2 for the second largest number and number 3 for the third largest number.</p> <p>For example, if your hospital is a medical/surgical acute care hospital and this quarter you had 20 claims denied for inpatient medically unnecessary, 10 for not responding in time to the RACs or no documentation provided and 5 were miscellaneous (and would fall under Other Medical/Surgical Acute Care Hospital/Unit reasons) then these would be your rankings.</p> <p>Number 1: Medical/Surgical Acute Care Hospital/Services – Medically Unnecessary Inpatient stay Longer than 3 Days Number 2: Medical/Surgical Acute Care Hospital/Services – No Documentation Provided or Insufficient Documentation in the Medical Record Number 3: Medical/Surgical Acute Care Hospital/Services – All Other</p>	
<p>12. Rank order the denial reasons experienced by the <u>estimated total dollar value</u> of the complex claim denials for <u>this quarter</u>.</p> <p>Number 1 for the largest and number 3 for the third largest dollar value of claim denials <u>this quarter</u>.</p>	<p>The top three denial reasons are based on the estimated total dollar value of the claims denied this quarter through the complex claim review process and is indicated on the demand letter from the RAC.</p> <p>Number 1 is the denial reason with the greatest dollar amount of denied claims and Number 3 would be the reason with the third largest dollar amount of claims associated with it.</p> <p>User chooses from reasons as noted above.</p>	<p>VNote: This dollar value is from the estimated Medicare reimbursement overpayment amount provided on the demand letter.</p>
<p>13. List the top three MS-DRGs for which your hospital has experienced a complex denial for <u>Incorrect MS-DRG or Other</u></p>	<p>The top three MS-DRGs for which your hospital has experienced a complex denial for Incorrect MS-DRG or Other Coding Error.</p> <p>List the top three MS-DRGs for which your hospital received an Incorrect MS-DRG or Other Coding Error denial. Select the top three MS-DRGs based on the</p>	<p>VNote: This dollar value is from the estimated overpayment amount.</p> <p>VNote: Please do not include the MS-DRGs for which you have received denials for <i>medical</i></p>

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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Coding Error.	estimated total dollar value of the claims denied for the MS-DRG. Number 1 is MS-DRG with the greatest dollar amount of denied claims and Number 3 would be the MS-DRG with the third largest dollar amount of claims associated with it. Enter the CMG code if your hospital uses these codes instead of MS-DRGs.	<i>necessity</i> . You will enter those MS-DRGs in the Medical Necessity Review section of the survey.
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AHA RACTrac Survey Questions and Data Definitions

APRIL 2011

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RACTrac Question (As they appear on the Survey)	User Definition	Vendor Notes (VNote) and Comments
Medical Necessity Review		
Medical Necessity Review Denials for 1 Day Stays		
1. Total number and Medicare reimbursement dollar amount of medical necessity review denials	Enter the total number of 1 day stay medical necessity review denials your hospital has received. Enter the total Medicare reimbursement dollar amount of those medical necessity review denials.	VNote: We are not asking for billed charges, rather the amount on the demand letter.
2. Number and Medicare reimbursement amount of medical necessity denials due to inappropriate setting	Enter the total number of 1 day stay medical necessity review denials your hospital has received because the RAC determined the care should have been provided in a different setting (i.e. inpatient care that should have been provided in observation or in the outpatient setting).	.VNote: Only enter the claims that were determined to be medically necessary but were denied due to inappropriate setting.
Medical Necessity Review Denials for 2-3 Day Stays		
3. Total number and Medicare reimbursement dollar amount of medical necessity review denials	Enter the total number of 2-3 day stay medical necessity review denials your hospital has received. Enter the total Medicare reimbursement dollar amount of those medical necessity review denials.	VNote: We are not asking for billed charges, rather the amount on the demand letter.
4. Number and Medicare reimbursement amount of medical necessity denials due to inappropriate setting	Enter the total number of 2-3 day stay medical necessity review denials your hospital has received because the RAC determined the care should have been provided in a different setting (i.e. inpatient care that should have been provided in observation or in the outpatient setting).	.VNote: Only enter the claims that were determined to be medically necessary but were denied due to inappropriate setting.
Medical Necessity Review Denials for Other Stays		
5. Total number and Medicare reimbursement dollar amount of medical necessity review denials	Enter the total number of Other medical necessity review denials your hospital has received. Enter the total Medicare reimbursement dollar amount of those medical necessity review denials.	VNote: We are not asking for billed charges, rather the amount on the demand letter.
6. Number and Medicare reimbursement amount of medical necessity denials due to inappropriate setting	Enter the total number of Other medical necessity review denials your hospital has received because the RAC determined the care should have been provided in a different setting (i.e. inpatient care that should have been provided in observation or in the outpatient setting).	.VNote: Only enter the claims that were determined to be medically necessary but were denied due to inappropriate setting.

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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Top 3 MS-DRGs Associated with Medical Necessity Review Denials

<p>Top three MS-DRGs Associated with Medical Necessity Review Denials</p>	<p>List the top three MS-DRGs for which your hospital received medical necessity denials. Select the top three MS-DRGs based on the estimated total dollar value of the claims denied for the MS-DRG.</p> <p>Number 1 is MS-DRG with the greatest dollar amount of denied claims and Number 3 would be the MS-DRG with the third largest dollar amount of claims associated with it.</p> <p>Enter the CMG code if your hospital uses these codes instead of MS-DRGs.</p>	<p>VNote: Please do not include the MS-DRGs for which you have received denials for Incorrect MS-DRG or Other Coding Error. Those should be entered in the Overpayments (Complex) section of the survey.</p>
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AHA RACTrac Survey Questions and Data Definitions

APRIL 2011

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RACTrac Question (As they appear on the Survey)	User Definition	Vendor Notes (VNote) and Comments
Underpayments		
<input type="checkbox"/> Check here if your hospital is not tracking underpayments. (If checked, skip to Appeals.)	By checking this box, you are indicating that your hospital is not tracking underpayment experience at the present time.	
1. Total cumulative number of claims identified as underpayments	The RACs run Medicare claims through proprietary software to find potentially improper payments; this may include scenarios where the provider was paid less than the appropriate amount for the service. Alternatively, a provider may have an underpayment detected upon medical record review or complex review. Please total the number of claims (automated or complex) that were identified as an underpayment by the RAC.	
2. Estimate of total cumulative Medicare reimbursement dollars associated with underpayments	The RAC will identify the underpayment on the notification letter and estimate an amount for that underpayment. Please total the estimated dollar value of the underpayment.	VNote: We are not asking for billed charges, nor are we asking for original payment. Please sum the Medicare reimbursement impact from any underpayment notification letters.
3. Total cumulative Medicare reimbursement dollars actually returned to facility	Indicate the actual total dollars returned to the facility to date by the Fiscal Intermediary or Medicare Administrative Contractor.	
4. Indicate the reasons identified by the RAC for underpayment this quarter. Check all that apply	The reason(s) provided by the RAC for why claims are identified as underpayments. Below are the choices for this question Billing Error Inpatient Discharge Disposition Incorrect MS-DRG Outpatient Coding Error All Other	

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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Underpayment Reasons		
Billing Error	Use this reason code to denote an inappropriate payment resulting in an underpayment.	
Inpatient Discharge Disposition	Use this reason code to denote when a provider billed an inaccurate discharge disposition for the patient. For example, patients who are intended to receive home-health services, but never do for a variety of reasons. In the post-acute care Medicare reimbursement methodology, these patients might otherwise inappropriately trigger a reduction in reimbursement for the hospital.	
Incorrect MS-DRG	Use this reason code to denote when a hospital incorrectly coded a lower paying MS-DRG when the documentation or information on the claim should have resulted in a higher paying MS-DRG.	
Outpatient Coding Error	Use this reason code to denote an error in HCPCS code assignment or other Outpatient coding related error.	Not noted in the demo
All Other	If the reason for the underpayment is not listed here, please check "other" and send AHA an email about the new reasons for underpayments that have been identified above. Please include the number of claims and the dollars associated with that underpayment reason so we can best determine if this is an isolated incident or if your reason should be added to the data we are capturing.	

AHA RACTrac Survey Questions and Data Definitions

APRIL 2011

Contact RACTrac Support with Questions:
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Appeals		
1. Total number of appeals filed	<p>The total (cumulative) number of appeals filed for claims denied through the automated and complex review processes. An appeal is NOT a rebuttal to the RAC but rather an appeal filed to the Fiscal Intermediary (FI) for redetermination (or for some the Medicare Administrative Contractor (MAC)). Each claim filed with the FI or MAC counts only once regardless of the number of levels of appeals it goes through.</p> <p><i>Regardless of whether or not this claim was identified through the automated or complex process, if it was appealed it should be noted here.</i></p>	VNote: Once it has been appealed to the FI or MAC then that appeal only counts once.
1A. Total dollar value of the denials filed for appeal	<p>Please indicate the estimated total dollar value of all your denied claims filed for appeal to the FI or MAC to date.</p> <p><i>Regardless of whether or not this claim was identified through the automated or complex process, if it was appealed it should be noted here.</i></p>	VNote: Dollar value of a denied claim is what was indicated on the demand letter.
2. Total number of appeals overturned in favor of the provider at any level of the appeals process	<p>Once a claim has been appealed, it can be overturned at any level of the appeals process (FI, QIC, ALJ, MAC etc.). Please indicate the total number of claims that have been successfully overturned in favor of the provider at any level to date. (This does not include any rebuttals to the RACs that were then overturned in favor of the provider.)</p>	
2A. Total dollars associated with appeals that have been overturned in favor of the provider at any level of the appeals process to date	<p>Once a claim has been appealed, it can be overturned at any level of the appeals process (FI, QIC, ALJ, MAC etc.). Please indicate the estimated total dollars associated with all the claims that have been successfully overturned in favor of the provider to date. (This does not include any denials overturned in the discussion period.)</p>	VNote: In the AHA RACTrac claim tool the dollar value is pulled from the value stated on the demand letter. However, any appeal entity can issue a fully favorable or partially favorable finding. Ideally vendors should capture the actual dollar value as AHA's tool could over estimate the dollars returned.

AHA RACTrac Survey Questions and Data Definitions

APRIL 2011

Contact RACTrac Support with Questions:
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RACTrac Question (As they appear on the Survey)	User Definition	Vendor Notes (VNote) and Comments
3. Total number of appeals that were initially filed to the FI/MAC and later withdrawn from the process or not continued	<p>Please indicate the total number of appeals that were initially filed to the FI or MAC and then withdrawn or stopped by the provider at any level of the appeals process.</p> <p>Most often these are appeals that the provider only pursued to a certain level and then made a determination that it was no longer worth pursuing further and the denial remains upheld. Several reasons may justify this decision including but not limited to: not enough documentation to support an appeal moving forward, the dollar value of the claim is not enough to warrant the cost of a lengthy appeals process, the hospital missed a deadline for filing an appeal to get it to the next step in the process, not enough resources to appeal every claim, or the merits of the case do not warrant pursuing the appeal further.</p>	
3A. Total dollar value of the appeals that were initially filed to the FI/MAC and later withdrawn from the process or not continued	<p>Please indicate the estimated total dollar value of appeals that were initially filed to the FI or MAC and then withdrawn or stopped by the provider at any level of the appeals process. The dollar value is indicated on the demand letter.</p>	
4. Total number of appeals currently in process	<p>These appeals have been filed and are currently in process at various levels of the appeals process. They have not been overturned or withdrawn or stopped for any reason.</p>	
4A. Total dollar value of the appeals currently in process	<p>These appeals have been filed and are currently in process at various levels of the appeals process. They have not been overturned or withdrawn or stopped for any reason. Indicate the estimated dollar value of these appeals in process.</p>	
5. Average administrative cost per appeal (cost associated with the appeals process)	<p>Enter the costs incurred as a result of appealing RAC denials. Enter the average administrative (including legal costs) cost per appeal.</p>	<p>VNote: There are many different costs associated with pursuing the Medicare Appeals Process. The types of costs (staff time, legal costs, copying costs, etc) vary by hospital. Please indicate the average cost of</p>

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

Contact RACTrac Support with Questions:
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<p>6. For the appeals filed this quarter, please indicate the services in which the denials occurred.</p>	<p>Appealed claims can fall in any number of service areas of the hospital. For question 6A, your hospital type has been pre-selected based on your answer to the Overpayments (automated section). For question 6B please indicate the services in which automated and complex RAC denials have occurred for your hospital this quarter.</p>	<p>pursuing the appeals process per appeal. VNote: If you do not have new appeals activity this quarter, please skip these questions and go to the Administrative Burden section.</p>
<p>7. For the appeals filed this quarter, please indicate the denial reasons cited on those claims.</p> <p>Please indicate the reasons that complex RAC both automated and complex RAC denials have occurred for your hospital this quarter.</p>	<p>On the correspondence from the RAC to the provider, the RAC indicates the reason for the overpayment. AHA has broadly categorized selected reasons by hospital type that were identified during the demonstration program. Please read carefully through each of the denial reasons to determine ANY and ALL categories which reflect the reason for appeal for this quarter.</p> <p>The denial reasons for both automated and complex are noted in the Automated and Complex sections above.</p>	

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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8. For those appeals <u>this quarter</u> that have been overturned in favor of the provider, please indicate the reason for the overturn. Check all that apply.		
Appeal Overturn Reasons		
No reason yet provided by entity overturning the appeal.	During the demonstration the reasons for over turned denials were not stated. Dollars were just refunded to the provider.	
The RACs have not provided accurate justification for reopening a claim after a certain period of time	This is often related to “good cause”, a legal argument challenging the legality of a provider reopening the claim greater then 1 year.	
Care provided was found to be medically necessary	Many of the claims appealed were denied based on the RACs findings of not medically necessary. A large number of appeals in the demonstration were over turned when the appeals entities found the care to have been appropriate.	
All Other		

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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RACTracsupport@providercs.com or 1-888-722-8712

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Administrative Burden		
<p>1. Please estimate the average number of hours or percent of FTEs devoted to all activities related to managing the RAC process within your organization by type of staff <u>this quarter</u>.</p>	<p>Activities include but are not limited to –</p> <ul style="list-style-type: none"> ▶ Tracking Automatic Denials includes recording and tracking demand letters and tracking patient account adjustments based on RAC activity ▶ Tracking Complex Denials includes recording and tracking of chart requests, retrieving and reviewing requested charts, copying requested charts, sending charts to RAC, , tracking RAC determinations, and tracking patient account adjustments that result from RAC activity ▶ Rebuttals include conducting chart review and/or research, developing and creating rebuttal letters, sending rebuttal letters with supporting documentation, additional correspondence/conference calls with RAC regarding rebuttal, tracking and recording RAC rebuttal responses ▶ Appeals include tracking recoupment on accounts in advance of sending appeal to FI, assembling appeals materials (e.g., CMS 20027, appeal letter, supporting documentation), conducting re-review of case, sending appeal correspondence to FI, tracking and recording FI response. ▶ RAC Team Activities include RAC team meetings, time spent on RAC progress report, etc.. <p>Choices of staff include:</p> <ul style="list-style-type: none"> ▶ Administrative/Clerical Staff ▶ Case Managers ▶ CEO ▶ Chief Financial Officer/Vice President Finance ▶ Coders/Health Information Managers ▶ Compliance Officer ▶ In-house Legal Counsel/Lawyer ▶ Information Technology ▶ Medical Director/Vice President Medical Affairs ▶ Medical Records Director ▶ Medical Records Staff ▶ Nurse 	

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

Contact RACTrac Support with Questions:
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	<ul style="list-style-type: none"> ▶ Patient Financial Services--Director ▶ Patient Financial Services--Staff ▶ Physician ▶ RAC Coordinator ▶ Revenue Cycle Management ▶ Utilization Management ▶ Vice President (other than CFO) ▶ Other 	
Average Number of Hours Per Week <u>OR</u>	The average number of hours worked per week this quarter by type of the staff on activities related to the RAC Program	VNote: Please enter either average number of hours per week this quarter OR number of FTEs this quarter. Please do not enter both.
Number of FTEs (e.g., .75 or 2.5)	The full time equivalents (.25, .5, .75, etc) required by each type of staff to support each task identified by the facility this quarter .	
<p>2. Please select any external services you have hired to assist you in managing the RAC process within your organization. Please estimate the total dollars paid to these outside consultants this quarter.</p>	<p>Select and provide an estimate</p> <p><input type="checkbox"/> No External Support</p> <p><input type="checkbox"/> External Legal Counsel Total Dollars _____</p> <p><input type="checkbox"/> Other Consultant Total Dollars _____</p> <p><input type="checkbox"/> Medical Record Copying Service Total Dollars _____</p> <p><input type="checkbox"/> Utilization Management Consultant Total Dollars _____</p> <p><input type="checkbox"/> Other (specify in text box) Total Dollars _____</p>	

**AHA RACTrac Survey Questions and Data Definitions
APRIL 2011**

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RACTrac Question (As they appear on the Survey)	User Definition	Vendor Notes (VNote) and Comments
<p>3. What has been the impact of the RAC (financial recoupment of dollars, costly appeals process, and increased administrative burden) on your organization this quarter?</p> <p>(Check all that apply)</p>	<ul style="list-style-type: none"> <input type="checkbox"/> No impact <input type="checkbox"/> Modified admission criteria to reduce risk of future RAC denials <input type="checkbox"/> Had to make cutbacks because of financial hardships due to RAC recoupment of Medicare dollars (e.g. limited services, reduced number of beds, reduced staffing) <input type="checkbox"/> Additional administrative responsibilities of clinical staff to respond RAC has taken them away from direct patient care <input type="checkbox"/> Increased administrative costs to manage responses to RAC requests and or appeals etc. <input type="checkbox"/> Employed additional staff or hire external resources to manage the RAC process <input type="checkbox"/> Initiated a new internal task force to manage and or respond to the RAC process <input type="checkbox"/> Tracking Software <input type="checkbox"/> Training and Education <input type="checkbox"/> OTHER 	
<p>4. How would you rate the responsiveness to your inquiries and the overall communication with your RAC?</p>	<p>Please indicate the responsiveness and overall communication from your RAC by selecting either Excellent, Good, Fair, Poor or No Opinion.</p>	<p>VNote: The RAC Process Problems section of the survey was added to determine the impact on hospitals of a myriad of RAC operational issues. Your responses to these questions will help AHA in their discussions with CMS regarding problems with the RAC program.</p>
<p>5. Average timeline in which the RAC responded to your inquiries</p>	<p>Please indicate the average amount of time it took for the RAC to respond to your inquiries.</p>	

AHA RACTrac Survey Questions and Data Definitions

APRIL 2011

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RACTrac Question (As they appear on the Survey)	User Definition	Vendor Notes (VNote) and Comments
<p>6. Have you received any education from CMS and/or your FI on corrective actions your facility can take to limit the risk of additional RAC denials of paid claims?</p> <p>6B. If yes, how effective was this education?</p>	<p>Please indicate whether the Centers for Medicare and Medicaid Services (CMS) or your Fiscal Intermediary (FI) or Medicare Audit Contractor (MAC) has provided any education to assist your hospital in avoiding future RAC Audits.</p> <p>If you have received education, please indicate in question 6B how effective the education was by selecting either Excellent, Good, Fair, Poor or No Opinion.</p>	
<p>7A. Have you had any RAC denials overturned during the discussion period?</p> <p>7B. If yes, how many?</p>	<p>7A. Please indicate whether you have had any denials overturned by the RAC during the discussion period.</p> <p>All RACs are required to allow a discussion period in which a hospital may share additional information and discuss the denial with the RAC. During the discussion period a hospital may gain more information from the RAC to better understand the cause for the denial and the RAC may receive additional information from the hospital that could potentially result in the RAC reversing its denial. The discussion period happens before the appeals process and is not a formal part of the Medicare Appeals Process.</p> <p>7B. If you have had denials overturned in the discussion process, please indicate how many.</p>	
<p>8A. Please select the issues you experienced during the previous calendar quarter.</p> <p>8B. If Other issues/problems was selected, please provide details here.</p>	<p>Select each of the following issues your experienced with your RAC during the previous quarter.</p> <p>Full list of choices for question 8A.</p> <ul style="list-style-type: none"> • RAC is auditing a particular MS-DRG or type of claim that is not approved by CMS 	<p>VNote: Please only select the issues you experienced during the previous calendar quarter. We are attempting to determine which issues are ongoing and which issues have been resolved.</p>

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	<ul style="list-style-type: none"> • RAC is mailing medical record requests to wrong hospital or wrong contact at your hospital • RAC is rescinding medical record requests after you have already submitted the records • RAC is auditing claims that are older than the 3 year look-back period • RAC is issuing more than one medical record request within a 45-day period • RAC is not meeting 60-day deadline to make a determination on a claim • Long lag (greater than 15 days) between date on demand letter and receipt of demand letter • Long lag (greater than 30 days) between date on review results letter and receipt of demand letter • Problems reconciling pending and actual recoupment due to insufficient or confusing information on the remittance advice • Problems with remittance advice RAC code N432 • Not receiving a demand letter informing the hospital of a RAC denial • Receiving a demand letter announcing a RAC denial and pending recoupment AFTER the denial has been reported on the remittance • Problems with postage reimbursement • Demand letters lack a detailed explanation of the RAC's rationale for denying the claim • Other issues/problems <p>8B. Please use text box to indicate Other issues/problems not listed in question 8A.</p>	<p>A rescind is the decision by the RAC contractor to not continue with the targeting of a requested medical record. It occurs after you have received a request for documentation, but you do not receive a determination notice (because it has been stopped, or rescinded) from the RAC contractor.</p>
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